

Management Information Exchange
43 Winter Street, 8th Floor
Boston, MA 02108

March 7, 2003

Mattie C. Condray
Senior Assistant General Counsel
Office of Legal Affairs
Legal Services Corporation
750 1st Street, N.E., 11th Floor
Washington, D.C. 20002-4250

Re: Response to Request for Comments on LEP Guidance

Dear Ms. Condray:

The Management Information Exchange (MIE) is a national, volunteer-driven organization whose mission is to spark excellence in leadership, management and fundraising in legal services programs serving low income clients, through training, consulting and publishing activities of the highest quality. In that capacity we have relatively frequent occasion to learn of various program management issues and concerns – whether through articles submitted for publication, in dialogues that take place at various training sessions, or in the MIE-sponsored *Management Roundtables*. Additionally, member programs often share comments that they submit. We would accordingly like to offer the following comments and observations regarding the Corporations's role in ensuring that its grantees "are providing proper service to persons with limited English proficiency (LEP)".

Since detailed comments have been separately submitted on behalf of the program by which I am employed (Northwest Justice Project [NJP] – Washington State), I assume you will not object to our "economizing" by noting that the observations offered in that communication are roundly shared by MIE's member programs and leadership. Like NJP, and no doubt many other groups and programs that will comment, MIE understands and very much appreciates LSC's desire to assist recipients in serving LEP populations; it also commends the approach that is being taken to determine the most appropriate course.

With regard to the specific issues noted, MIE strongly believes that:

- LSC should not issue its own Title VI LEP compliance regulations;
- Because the current understanding that LSC is not a "federal agency" is correct and should be maintained, additional non-regulatory guidance

would result in little, if any, value being added and could easily spawn unintended and undesirable consequences in other areas;

- Formal “commendation” of the DOJ guidance is not necessary and would not be particularly helpful;
- The most constructive possible approach is for LSC to serve as a catalyst and facilitator in fostering the identification, collection and dissemination of information regarding effective methods and strategies for serving LEP communities – not only for its immediate grantees, but for all those organizations and individuals who are actively contributing to statewide justice communities.

With regard to the last point noted above, we would strongly encourage LSC to recognize that MIE is a potentially valuable ally/partner in any efforts that LSC might undertake along the following lines:

- sponsoring conferences or training events;
- affording appropriate library/clearinghouse functions relative to the compiling of relevant information concerning language assistance, interpreter protocols, costs, standards, and etc.;
- soliciting and publishing relevant articles in the *Journal* (e.g., *Report on Emerging Translation Technology*; *Best Practices*); and
- Technical assistance and consulting.

Your consideration of our reactions and suggestions is very much appreciated.

Sincerely,

Patrick McIntyre
Vice President; Regulations Committee Chair

C: Board of Directors
Executive Director